

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS INC., *et al.*,  
  
Debtors

Chapter 11

Case No. 08-13555 (JMP)  
  
(Jointly Administered)

In re:

LEHMAN BROTHERS INC.,  
  
Debtor.

SIPA Proceeding

Case No. 08-01420 (JMP)

**STIPULATION AND ORDER BETWEEN LBHI, SIPA TRUSTEE,  
CREDITORS' COMMITTEE, AND BARCLAYS REGARDING SCHEDULING**

This Stipulation concerning Scheduling (the "Stipulation") is entered into by and between the undersigned counsel, acting for and on behalf of their respective clients: (a) Lehman Brothers Holdings Inc. and its affiliated debtors and debtors in possession in the Chapter 11 Cases ("LBHI"); (b) James W. Giddens, as Trustee in the Securities Investor Protection Act Liquidation of Lehman Brothers Inc. (the "SIPA Trustee"); (c) the Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc. and its affiliated debtors and debtors in possession (the "Creditors' Committee"); and (d) Barclays Capital Inc. and its affiliates ("Barclays").

WHEREAS, on September 20, 2008, the Bankruptcy Court issued (i) an Order Authorizing and Approving (A) the Sale of Purchased Assets Free and Clear of Liens and Other Interests and (B) Assumption and Assignment of Executory Contracts and Unexpired Leases, and (ii) an Order Approving, and Incorporating by Reference for Purposes of the Proceeding, an

Order Authorizing the Sale of Purchased Assets and Other Relief in the Lehman Brothers Holdings Inc. Chapter 11 Proceeding (together, the “Sale Orders”);

WHEREAS, on September 15, 2009, LBHI, the SIPA Trustee, and the Creditors’ Committee (collectively, the “Movants”) filed motions for relief from the Sale Order(s) pursuant to Federal Rule of Civil Procedure 60(b) and Federal Rule of Bankruptcy Procedure 9024 as incorporated therein;

WHEREAS, on October 27, 2009, the Honorable James M. Peck entered the Scheduling Order Concerning Certain Motions Filed by LBHI, SIPA Trustee and Creditors Committee (the “Scheduling Order”);

WHEREAS, on January 28, 2010, by letter to the Court, special counsel to LBHI on behalf of Movants requested a two-week adjournment from the following deadlines in the Scheduling Order:

Fact discovery cut-off: From February 15 to March 1, 2010 (Scheduling Order ¶¶ 7, 10)

Movants’ expert reports: From March 1 to March 15, 2010 (*id.* ¶ 11)

Movants’ reply papers: From March 4 to March 18, 2010 (*id.* ¶ 12)

Barclays’ reply papers, re: undelivered assets: From March 18 to April 5, 2010 (*id.* ¶ 13)

Oral argument: From March 25 to April 9, 2010 or as available on Court’s calendar (*id.* ¶ 14);

WHEREAS, on February 2, 2010, the Court held a telephone conference regarding scheduling during which Barclays did not oppose Movants’ request for a two-week adjournment of the aforementioned-dates;

NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED, AND UPON COURT  
APPROVAL HEREOF, IT IS ORDERED THAT:

1. The deadline for fact discovery has been adjourned from February 15, 2010 to March 1, 2010;
2. The deadline for Movants' expert reports has been adjourned from March 1, 2010 to March 15, 2010;
3. The deadline for Movants' reply papers has been adjourned from March 4, 2010 to March 18, 2010;
4. The deadline for Barclays' reply papers regarding undelivered assets has been adjourned from March 18, 2010 to April 5, 2010; and
5. Oral argument has been adjourned from March 25, 2010 to April 9, 2010.

Dated: February 3, 2010  
New York, New York

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Creditors*

SO ORDERED: this 11<sup>th</sup> day of February 2010

s/ James M. Peck

HONORABLE JAMES M. PECK

UNITED STATES BANKRUPTCY JUDGE